

PROSKAUER ROSE LLP

ELISE M. BLOOM (admitted *pro hac vice*)
ebloom@proskauer.com
NEIL H. ABRAMSON (admitted *pro hac vice*)
nabramson@proskauer.com
ADAM M. LUPION (admitted *pro hac vice*)
alupion@proskauer.com
RACHEL S. PHILION (admitted *pro hac vice*)
rphilion@proskauer.com
NOA M. BADDISH (admitted *pro hac vice*)
nbaddish@proskauer.com
JOSHUA S. FOX (admitted *pro hac vice*)
jfox@proskauer.com
Eleven Times Square
New York, NY 10036
Telephone: (212) 969-3000
Facsimile: (212) 969-2900

PROSKAUER ROSE LLP
PHILIPPE A. LEBEL (SBN 274032)
plebel@proskauer.com
2029 Century Park East, 24th Floor
Los Angeles, CA 90067-3010
Telephone: (310) 557-2900
Facsimile: (310) 557-2193

PROSKAUER ROSE LLP

MARK W. BATTEN (admitted *pro hac vice*)
mbatten@proskauer.com
SAMANTHA R. MANELIN (admitted *pro hac vice*)
smanelin@proskauer.com
One International Place
Boston, MA 02110-2600
Telephone: (617) 526-9600
Facsimile: (617) 526-9899

Attorneys for Defendants

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

AARON SENNE, *et al.*,

Plaintiffs,

vs.

OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
doing business as MAJOR LEAGUE
BASEBALL, *et al.*,

Defendants.

Case No. CV 14-00608 JCS (consolidated
with 3:14-cv-03289-JCS)

Hon. Joseph C. Spero

CLASS ACTION

**DECLARATION OF ELISE M.
BLOOM IN SUPPORT OF
DEFENDANTS' REPLY
MEMORANDUM OF POINTS AND
AUTHORITIES IN FURTHER
SUPPORT OF DEFENDANTS'
MOTION FOR LEAVE TO FILE A
MOTION FOR DECERTIFICATION
OF THE RULE 23 CLASSES AND
FLSA COLLECTIVE**

1 I, Elise M. Bloom, declare as follows:

2 1. I am a partner at Proskauer Rose, LLP, counsel for all Defendants in this matter.

3 2. I submit this declaration in support of Defendants' Reply Memorandum of Points
4 and Authorities in Further Support of Defendants' Motion for Leave to File a Motion for
5 Decertification of the Rule 23 Classes and FLSA Collective.

6 3. I have personal knowledge of the facts contained in this declaration, and if called
7 to testify, I could and would testify competently thereto.

8 4. Attached hereto as **Exhibit 1** is a true and correct copy of the relevant excerpts of
9 Dr. Brian Kriegler's Deposition ("Kriegler Tr."), taken on September 22, 2021.

10
11 I declare under penalty of perjury that the foregoing is true and correct. Executed this 25th day
12 of January, 2022.

13 /s/ Elise M. Bloom

14 Elise M. Bloom
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